

Exhibit A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.
Technologies, a California corporation;
MOZILLA FOUNDATION, a California public
benefit corporation; LAURA CHAMBERS and
her marital community; WINIFRED MITCHELL
BAKER and her marital community, and DANI
CHEHAK and her marital community.

Defendants.

Case No. 2:24-cv-1032

**DEFENDANT MOZILLA
CORPORATION'S RESPONSES
TO PLAINTIFF'S SECOND SET
OF INTERROGATORIES AND
REQUEST FOR PRODUCTION**

TO: Plaintiff Steve Teixeira

AND TO: Plaintiff's Counsel of Record

Defendant Mozilla Corporation ("Defendant"), by and through their counsel of record, hereby responds to Plaintiff Steve Teixeira ("Plaintiff") Second Set of Interrogatories and Requests for Production to Defendant Mozilla Corporation as follows:

GENERAL OBJECTIONS AND DEFINITIONS

The following General Objections shall be considered as made, to the extent applicable, in response to each of the Interrogatories and Requests, as if the General Objections were fully set forth in each such response, including those responses which also set forth specific objections.

1. Defendant objects to each Interrogatory and Request to the extent that it seeks to impose obligations beyond those set forth by the Federal Rules of Civil Procedure.

usage, are relevant, responsive, and non-privileged. To the extent Plaintiff required Defendant to do more than the foregoing, Defendant objects to each and every Request on the ground that it would subject Defendant to oppression, harassment, and undue burden.

ANSWER TO INTERROGATORIES

INTERROGATORY NO. 8: Identify all Mozilla Corporation employees who separated from employment with Mozilla Corporation within six months of taking a leave of absence, including the circumstances of their separations (voluntary or involuntary), since January 1, 2015.

ANSWER TO INTERROGATORY NO. 8:

Defendant objects to this Interrogatory on the grounds that it seeks documents containing information pertaining to individuals, the disclosure of which would constitute a violation of any individual's right of privacy under Article I, Section 7 of the Washington Constitution and/or any other constitutional, statutory, or common law right of privacy. Defendant also objects to this Interrogatory as overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. This Interrogatory asks for information relating to Defendant's employees, regardless of their relation to Plaintiff's allegations in the Complaint. Additionally, this Interrogatory is overbroad in time and scope. This Interrogatory seeks information spanning nearly a decade (and seven years before Plaintiff was hired). Defendant also objects to this Interrogatory on the grounds that it seeks information protected by the attorney-client privilege, work-product doctrine, and/or other applicable privileges.

INTERROGATORY NO. 9: Identify all Mozilla Corporation employees who separated from employment with Mozilla Corporation after requesting a disability accommodation, including the circumstances of their separations (voluntary or involuntary), since January 1, 2015.

ANSWER TO INTERROGATORY NO. 9:

1 Defendant objects to this Interrogatory on the grounds that it seeks documents containing
2 information pertaining to individuals, the disclosure of which would constitute a violation of any
3 individual's right of privacy under Article I, Section 7 of the Washington Constitution and/or any
4 other constitutional, statutory, or common law right of privacy. Defendant also objects to this
5 Interrogatory as overly broad, unduly burdensome, and not reasonably tailored or proportional to
6 the needs of this case insofar as it seeks information that is not relevant to any party's claims or
7 defenses. This Interrogatory asks for information relating to Defendant's employees, regardless of
8 their relation to Plaintiff's allegations in the Complaint. Additionally, this Interrogatory is
9 overbroad in time and scope. This Interrogatory seeks information spanning nearly a decade (and
10 seven years before Plaintiff was hired). Defendant also objects to this Interrogatory on the grounds
11 that it seeks information protected by the attorney-client privilege, work-product doctrine, and/or
12 other applicable privileges.

13
14 **INTERROGATORY NO. 10:** As to the employees identified in Answers to
15 Interrogatories Numbers 8 and 9, provide their most recent annual review ratings immediately
16 before taking leave and their first annual review ratings immediately after taking leave.

17 **ANSWER TO INTERROGATORY NO. 10:**

18 Defendant objects to this Interrogatory on the grounds that it seeks documents containing
19 information pertaining to individuals, the disclosure of which would constitute a violation of any
20 individual's right of privacy under Article I, Section 7 of the Washington Constitution and/or any
21 other constitutional, statutory, or common law right of privacy. Defendant also objects to this
22 Interrogatory as overly broad, unduly burdensome, and not reasonably tailored or proportional to
23 the needs of this case insofar as it seeks information that is not relevant to any party's claims or
24 defenses. This Interrogatory asks for information relating to Defendant's employees, regardless of
25 their relation to Plaintiff's allegations in the Complaint. Additionally, this Interrogatory is
26 overbroad in time and scope. This Interrogatory seeks information spanning nearly a decade (and

seven years before Plaintiff was hired). Defendant also objects to this Interrogatory on the grounds that it seeks information protected by the attorney-client privilege, work-product doctrine, and/or other applicable privileges.

INTERROGATORY NO. 11: Identify and describe Mozilla Corporation's policies and practices for addressing internal claims of discrimination in place since January 1, 2015, including without limitation any written policies or materials.

ANSWER TO INTERROGATORY NO. 11:

Defendant objects to this Interrogatory on the grounds that it is overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. This Interrogatory seeks information spanning nearly a decade (and seven years before Plaintiff was hired), which is excessive and not reasonably limited in time and scope. Defendant also objects to this Interrogatory on the grounds that it seeks information protected by the attorney-client privilege, work-product doctrine, and/or other applicable privileges. Without waiving the objections, Defendant responds as follows:

Defendant refers to its policies, which will be produced in response to Plaintiff's Second Set of Requests for Production of Documents.

INTERROGATORY NO. 12: Identify any internal discrimination complaints for which the process identified in response to Interrogatory No. 10 was not followed, including how the process was not followed and the reason(s) why the process was not followed.

ANSWER TO INTERROGATORY NO. 12:

Defendant objects to this Interrogatory on the grounds that it seeks documents containing information pertaining to individuals, the disclosure of which would constitute a violation of any individual's right of privacy under Article I, Section 7 of the Washington Constitution and/or any

1 defenses. Additionally, this Interrogatory is overbroad in time and scope. Further, this
 2 Interrogatory asks for information relating to Defendant's employees, regardless of their relation
 3 to Plaintiff's allegations in the Complaint. Defendant also objects to this Interrogatory on the
 4 grounds that it seeks information protected by the attorney-client privilege, work-product doctrine,
 5 and/or other applicable privileges.

7 **RESPONSE TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

8 **REQUEST FOR PRODUCTION NO. 10:** Produce all recordings of and notes from Steering
 9 Committee meetings from June 1, 2023 to the present.

10 **RESPONSE TO REQUEST NO. 10:**

11 Defendant objects to this Request as overly broad, unduly burdensome, and not reasonably
 12 tailored or proportional to the needs of this case insofar as it seeks information that is not relevant
 13 to any party's claims or defenses. Additionally, this Request is overbroad in scope. Further, this
 14 Request asks for information relating to Defendant's employees, regardless of their relation to
 15 Plaintiff's allegations in the Complaint. Defendant also objects to this Request on the grounds that
 16 it seeks information protected by the attorney-client privilege, work-product doctrine, and/or other
 17 applicable privileges. Without waiving the objections, Defendant responds as follows:

18 Defendant will produce non-privileged notes and recording from the steering committee
 19 meetings from June 1, 2023 to June 1, 2024.

20
 21 **REQUEST FOR PRODUCTION NO. 11:** Produce all performance evaluations for 2022-2024
 22 for Mitchell Baker and all members of the Executive Steering Committee including Laura
 23 Chambers, Ian Carmichael, Dani Chehak, Eric Muhlheim, Lindsey O'Brien, Girish Rao, Brad
 24 Smallwood, Carlos Torres, Imo Udom, Kristen Trubey, and Suba Vasudevan.

RESPONSE TO REQUEST NO. 11:

Defendant objects to this Request on the grounds that it seeks documents containing information pertaining to individuals, the disclosure of which would constitute a violation of any individual's right of privacy under Article I, Section 7 of the Washington Constitution and/or any other constitutional, statutory, or common law right of privacy. Defendant also objects to this Request as overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. Additionally, this Request is overbroad in time and scope. Further, this Request asks for information relating to Defendant's employees, regardless of their relation to Plaintiff's allegations in the Complaint.

REQUEST FOR PRODUCTION NO. 12: Produce all CEO-approved financial and headcount budgets in effect from September 1, 2023 until December 31, 2023.

RESPONSE TO REQUEST NO. 12:

Defendant objects to this Request as overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. In particular, documents that merely mention or relate to the financial and headcount budgets are over encompassing and will not necessarily relate to claims or defenses. Additionally, this Request is overbroad in scope. Further, Defendant also objects to this Request on the grounds that it seeks information protected by the attorney-client privilege, work-product doctrine, and/or other applicable privileges. Without waiving the objections, Defendant responds as follows:

Defendant will agree to produce the final Board-approved financial budget from 2023.

REQUEST FOR PRODUCTION NO. 19: Produce Documents sufficient to show Mozilla Corporation's total revenue and revenue per user calculations each month since January 1, 2019.

RESPONSE TO REQUEST NO. 19:

Defendant objects to this Request as overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. Subject to and without waiving these objections, Defendant responds as follows:

Defendant is unable to comply with this request because such a report does not exist.

REQUEST FOR PRODUCTION NO. 20: Produce Documents sufficient to show Mozilla Corporation's product performance goals from October 1, 2023 to the present, and documents sufficient to show reporting regarding the attainment of such goals.

RESPONSE TO REQUEST NO. 20:

Defendant objects to this Request as overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. Defendant also objects to this Request on the grounds that it seeks information protected by the attorney-client privilege, work-product doctrine, and/or other applicable privileges. Subject to and without waiving these objections, Defendant responds as follows:

Defendant will produce the KPIs.

REQUEST FOR PRODUCTION NO. 21: Produce all complaints or reports made to Mozilla Corporation's Human Resources department regarding mistreatment or discrimination based on disability from January 1, 2015 to the present.

RESPONSE TO REQUEST NO. 21:

Defendant objects to this Request as overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. In particular, complaints that merely mention or relate to mistreatment are over encompassing and will not necessarily relate to Plaintiff's claims or defenses. Additionally, this Request is overbroad in time and scope. This Request seeks information spanning nearly a decade (and seven years before Plaintiff was hired). Further, Defendant also objects to this Request on the grounds that it seeks information protected by the attorney-client privilege, work-product doctrine, and/or other applicable privileges. Finally, Defendant objects to this Request on the grounds that it seeks documents containing information pertaining to individuals, the disclosure of which would constitute a violation of any individual's right of privacy under Article I, Section 7 of the Washington Constitution and/or any other constitutional, statutory, or common law right of privacy.

REQUEST FOR PRODUCTION NO. 22: Produce all documents referring or relating to the termination of Plaintiff's employment.

RESPONSE TO REQUEST NO. 22:

Defendant objects to this Request on the grounds that it seeks information protected by the attorney-client privilege, work-product doctrine, and/or other applicable privileges. Plaintiff was terminated after Plaintiff filed the instant lawsuit. All discussions and documents relating to his termination are privileged.

REQUEST FOR PRODUCTION NO. 23: Produce all documents identified in response to Interrogatory No. 16.

1 also objects to this Request on the grounds that it seeks documents containing information
2 pertaining to individuals, the disclosure of which would constitute a violation of any individual's
3 right of privacy under Article I, Section 7 of the Washington Constitution and/or any other
4 constitutional, statutory, or common law right of privacy. Without waiving the objections,
5 Defendant responds as follows:

6 Defendant will produce all non-privileged documents responsive to this Request.
7

8 **REQUEST FOR PRODUCTION NO. 26:** Produce all reports, summaries, follow-ups, tracking
9 documents, or excerpts related to the report and assessment of Mozilla Corporation by TK Law.

10 **RESPONSE TO REQUEST NO. 26:**

11 Defendant objects to this Request on the grounds that it seeks information protected by the
12 attorney-client privilege, work-product doctrine, and/or other applicable privileges. Defendant
13 also objects to this Request as overly broad, unduly burdensome, and not reasonably tailored or
14 proportional to the needs of this case insofar as it seeks information that is not relevant to any
15 party's claims or defenses. In particular, communications that merely mention or relate to the TK
16 Law report or assessment are over encompassing and will not necessarily relate to claims or
17 defenses.
18

19 **REQUEST FOR PRODUCTION NO. 27:** Produce all Correspondence regarding the TK Law
20 investigation, report, recommendations, assessment, and implementation of same.

21 **RESPONSE TO REQUEST NO. 27:**

22 Defendant objects to this Request on the grounds that it seeks information protected by the
23 attorney-client privilege, work-product doctrine, and/or other applicable privileges. Defendant
24 also objects to this Request as overly broad, unduly burdensome, and not reasonably tailored or
25 proportional to the needs of this case insofar as it seeks information that is not relevant to any
26 party's claims or defenses. In particular, communications that merely mention or relate to the TK

1 Law report or assessment are over encompassing and will not necessarily relate to claims or
2 defenses.

3
4 **REQUEST FOR PRODUCTION NO. 28:** Produce all Documents and Correspondence
5 regarding Plaintiff's application for unemployment insurance compensation.

6 **RESPONSE TO REQUEST NO. 28:**

7 Defendant objects to this Request as overly broad, unduly burdensome, and not reasonably
8 tailored or proportional to the needs of this case insofar as it seeks information that is not relevant
9 to any party's claims or defenses. Defendant objects to this Request on the grounds that it seeks
10 information protected by the attorney-client privilege, work-product doctrine, and/or other
11 applicable privileges. Without waiving the objections, Defendant responds as follows:

12 Defendant is unable to comply with this request because Mozilla never received an
13 unemployment claim from Plaintiff.

14
15 **REQUEST FOR PRODUCTION NO. 29:** Produce all Documents and Correspondence
16 describing any decisions to restructure leadership at Mozilla Corporation between January 1, 2022
17 and the present.

18 **RESPONSE TO REQUEST NO. 29:**

19 Defendant objects to this Request on the grounds that it seeks information protected by the
20 attorney-client privilege, work-product doctrine, and/or other applicable privileges. Defendant
21 objects to this Request as overly broad, unduly burdensome, and not reasonably tailored or
22 proportional to the needs of this case insofar as it seeks information that is not relevant to any
23 party's claims or defenses. In particular, "all documents" that merely mention or relate to
24 restructuring leadership between January 2022 and the present are over encompassing and will not
25 necessarily relate to claims or defenses.

VERIFICATION

I, Laura Chambers, the Chief Executive Officer of Mozilla Corporation a.k.a M.F. Technologies, declare under penalty of perjury under the laws of the State of Washington that I have read the foregoing answers and responses to Plaintiff's Second Set of Interrogatories and all of the answers and responses are true and correct to the best of my knowledge and belief.

4/2/2025 | 13:11 PDT

DECLARED this _____ day of April 2025.

Signed by:

Laura Chambers

BF20951752E2449

Mozilla Corporation a.k.a M.F. Technologies

1 Dated this 2nd day of April, 2025.

2 DLA PIPER LLP (US)

3 By: s/ Anthony Todaro

4 Anthony Todaro, WSBA No. 30391

5 By: s/ Alexandria Cates

6 Alexandria Cates, WSBA No. 53786

7 701 Fifth Avenue, Suite 6900

8 Seattle, Washington 98104-7029

9 Tel: 206.839.4800

10 E-mail: anthony.todaro@us.dlapiper.com

11 E-mail: alexandria.cates@us.dlapiper.com

12 *Attorneys for Defendants MOZILLA*

13 *CORPORATION a.k.a M.F.*

14 *TECHNOLOGIES, LAURA CHAMBERS,*

15 *WINIFRED MITCHELL BAKER, and*

16 *DANI CHEHAK*

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2025, I caused a true and correct copy of the foregoing document to be served on the parties listed below in the manner indicated:

Amy Alexander Mathew Harrington STOKES LAWRENCE, P.S. 1420 Fifth Avenue, Suite 3000 Seattle, WA 98101-2393 Telephone: (206) 626-6000 Fax: (206) 464-1496 Amy.alexander@stokeslaw.com Mathew.Harrington@stokeslaw.com laura.smith@stokeslaw.com sarah.armon@stokeslaw.com Maricarmen.Perez-Vargas@stokeslaw.com anna.armitage@stokeslaw.com <i>Attorneys for Plaintiff Steve Teixeira</i>	<input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-mail <input type="checkbox"/> Via the Court's E-Service Device
Darren A. Feider Amanda V. Masters SEBRIS BUSTO JAMES 15375 SE 30th Pl., STE 310 Bellevue, Washington 98007 dfeider@sbj.law amasters@sbj.law epruzinsky@sbj.law kmarchenko@sbj.law <i>Attorneys for Defendant Mozilla Foundation</i>	<input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-mail <input type="checkbox"/> Via the Court's E-Service Device

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this 2nd day of April, 2025.

s/ Jacey Bittle

Jacey Bittle, Legal Executive Assistant